## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Alexandria Division

UNITED STATES OF AMERICA	)	
	)	
v.	)	Case No. 1:21MJ161
	)	
MICHAEL THOMAS PRUDEN,	)	Honorable T.S. Ellis, III
	)	
Defendant.	)	

## MOTION FOR PERMISSION TO TRAVEL OUTSIDE OF NORFOLK TO RETRIEVE PROPERTY

Defendant, Michael Thomas Pruden, through counsel, hereby files this motion for permission to travel from Norfolk, Virginia to Maryland in order to retrieve personal property from his Maryland apartment on May 29, 2021. In support of this Motion, counsel states as follows:

- 1. On May 21, 2021, this Court issued an order setting conditions of release for Mr. Pruden, consistent with the conditions of release set by Magistrate Judge Davis on May 12, 2021.

  Among the conditions of release set by this Court are requirements that Mr. Pruden (1) reside with his third party custodian, Clarence Franklin, in Norfolk, Virginia; (2) be restricted to this Norfolk residence unless authorized to leave by Pretrial Services; and (3) not depart the Norfolk, Virginia area. *See* ECF Doc. 21 (paragraphs (6), (7)(f), (7)(p)(ii)).
- Prior to his arrest on May 7, 2021, Mr. Pruden was living in an apartment in Oxon Hill,
   Maryland. His clothes and other personal effects remain at that apartment. Mr. Pruden respectfully requests permission to travel with his third party custodian from Norfolk,

Virginia to his apartment in Oxon Hill, Maryland, on Saturday, May 29, 2021, in order to retrieve his personal items.<sup>1</sup>

Respectfully submitted,

MICHAEL THOMAS PRUDEN By counsel,

/s/ Shannon S. Quill Virginia Bar No. 76355 Attorney for M. Pruden Office of the Federal Public Defender 1650 King Street, Suite 500 Alexandria, VA 22314 (703)600-0850 (telephone) (703)600-0880 (facsimile) Shannon Quill@fd.org

## **CERTIFICATE OF SERVICE**

I hereby certify that on the 26th day of May 2021, I will file the foregoing with the Clerk of Court, using the CM/ECF system, which will provide notification to all counsel of record.

/s/	
Shannon S. Quill	

<sup>&</sup>lt;sup>1</sup>Given the condition of release requiring Mr. Pruden to remain in Norfolk, the Pretrial Services Officer informed defense counsel that the Court must approve the requested trip to Maryland.